

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MURRAY RUBINSTEIN, JEFFREY F. ST.)
CLAIR, WILLIAM MCWADE, HARJOT)
DEV and VIKAS SHAH, Individually and On) Case No. 14-cv-9465
Behalf of All Others Similarly Situated,)
Plaintiffs,) Judge Robert M. Dow, Jr.
v.) Magistrate Judge Maria Valdez
RICHARD GONZALEZ and ABBVIE INC.,)
Defendants.)

JOINT STATUS REPORT

The parties respectfully submit this status report to propose a schedule for expert discovery as directed by the Court's March 29, 2017 Minute Entry (Dkt. No. 61).

Specifically, the parties have met and conferred and reached agreement on the following proposed schedule:

- Expert disclosures and opening reports on issues for which the party bears the burden of proof: 60 days after the Court rules on the Plaintiffs' pending Motion for Class Certification
- Rebuttal expert disclosures and reports: 60 days after the opening reports are exchanged
- Completion of all expert discovery: 30 days after the exchange of rebuttal reports

Dated: August 23, 2018

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